

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

HOLLY NYGAARD and )  
QUANELL GEE, on behalf of themselves )  
and all others similarly situated, )

Plaintiffs, )

v. )

BEACH HOUSE HOSPITALITY )  
GROUP, LLC d/b/a )  
BEACH HOUSE BAR & GRILL; and )  
EREZ SUKARCHI, individually, )

Defendants. )

C/A: 4:20-CV-00233-JD

**PLAINTIFFS’ MOTION FOR  
SUMMARY JUDGMENT ON  
LIQUIDATED DAMAGES AND  
THREE-YEAR STATUTE  
OF LIMITATIONS**

Plaintiffs, Holly Nygaard (“Nygaard”) and Quanell Gee (“Gee”), on behalf of themselves and all others similarly situated, (all jointly “Plaintiffs”), by and through their undersigned counsel, hereby move this Honorable Court for an Order, pursuant to FRCP 56, granting summary judgment against Defendant Beach House Hospitality Group, LLC d/b/a Beach House Bar & Grill. The motion is supported by Plaintiffs’ Memorandum in Support of Motion for Summary Judgment.

*(Signature page to follow.)*

Plaintiffs' Motion for Summary Judgment on Liquidated Damages and Three-Year Statute of Limitations

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s/Bruce E. Miller

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**CHARLESTON, SC**

**August 31, 2022**